



Cindy Cox

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February 1, 2017

Ms. Jocelyn Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29211

Re: BellSouth Telecommunications, LLC d/b/a AT&T South Carolina, Annual  
Lifeline ETC Filing - Form 555 - WC Docket No., 11-42

Dear Ms. Boyd:

We are providing the following information in compliance with FCC requirements.<sup>1</sup> No Commission action is required.

On January 30, 2017, BellSouth Telecommunications LLC d/b/a/ AT&T South Carolina submitted the attached Form 555 to the Federal Communications Commission and the Universal Service Administrative Committee.

By copy of this letter, I am providing a copy of this filing to the Office of Regulatory Staff.

Sincerely,

cc: Nanette Edwards, ORS

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<sup>1</sup> See Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42, 27 F.C.C.R. 6656 (Rel. Feb. 6, 2012), Erratum Released May 16, 2012.



**Ron Hilyer**  
**Director**  
AT&T Services, Inc.  
675 W Peachtree Street, NW  
Rm 35H40  
Atlanta, GA 30308  
Phone: 770-810-0853  
E-mail: rh3168@att.com

January 30, 2017

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: Lifeline Compliance Filings, WC Docket No. 14-171  
2017 FCC Form 555 for **BellSouth Telecommunications, LLC** (Study Area Codes: 215191, 225192, 235193, 245194, 255181, 265182, 275183, 285184, 295185); **Southwestern Bell Telephone Company** (Study Area Codes: 405211, 415214, 425213, 435215); **Nevada Bell Telephone Company** (Study Area Code 555173); **Illinois Bell Telephone Company** (Study Area Code 345070); **Indiana Bell Telephone Company, Incorporated** (Study Area Code 325080); **Michigan Bell Telephone Company** (Study Area Code 315090); **The Ohio Bell Telephone Company** (Study Area Code 305150); and **Wisconsin Bell, Inc.** (Study Area Code 335220)

Dear Ms. Dortch:

Attached please find AT&T's 2017 FCC Form 555 on behalf of the above referenced affiliated eligible telecommunications carriers ("ETCs").<sup>1</sup>

The 2017 FCC Form 555 requires ETCs to report the number of subscribers claimed on its February 2016 FCC Form 497, among other data elements. In accordance with ¶ 17(a) of the Consent Decree in DA 15-485, in preparing the February 2016 Forms 497, AT&T performed its monthly statistically significant sample of the eligibility records for new Lifeline subscribers. In reviewing that sample, AT&T confirmed whether it had a complete, current, and accurate eligibility certification for each subscriber. AT&T also compared the sample to the NLAD database to confirm eligibility. In accordance with the Consent Decree, AT&T reduced the number of retail subscribers for whom it sought Lifeline reimbursement on its February 2016 FCC Forms 497 by applying the upper limit of the February 2016 weighted average error rates to the total number of retail subscribers. For this reason, the sum of the numbers reported in Block F and Block K of the AT&T affiliated ETCs FCC Form 555 do not equal the numbers reported in Block E<sup>2</sup>.

<sup>1</sup> BellSouth Telecommunications, LLC does business in nine states under a different name as follows: AT&T Alabama (SAC 255181), AT&T Florida (SAC 215191), AT&T Georgia (SAC 225192), AT&T Kentucky (SAC 265182), AT&T Louisiana (SAC 275183), AT&T Mississippi (SAC 285184), AT&T North Carolina (SAC 235193), AT&T South Carolina (SAC 245194), and AT&T Tennessee (SAC 295185). Southwestern Bell Telephone Company does business in each of the four states under a different name as follows: AT&T Arkansas (SAC 405211), AT&T Kansas (SAC 415214), AT&T Missouri (SAC 425213) and AT&T Oklahoma (SAC 435215). The remaining affiliated ETCs do business in each state using the following names: AT&T Nevada (SAC 555173), AT&T Illinois (SAC 345070), AT&T Indiana (SAC 325080), AT&T Michigan (SAC 315090), AT&T Ohio (SAC 305150) and AT&T Wisconsin (SAC 335220).

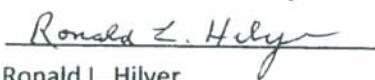
<sup>2</sup> In addition to the adjustment described pursuant to the Consent Decree, AT&T notes that the Nevada administrator conducted its annual recertification for the first time in 2016, and provided the numbers



AT&T is providing this information by cover letter rather than on the affiliated ETCs FCC Forms 555 based on advice from USAC in 2014 that modifications on FCC or OMB approved forms without written approval from the Commission are not accepted. Both USAC and Commission staff had no objection to AT&T providing this information in a cover letter.

Please do not hesitate to contact me if you have any questions about the information provided in this cover letter or if you desire any further information.

Very truly yours,

  
Ronald L. Hilyer  
Controller

Attachments

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reported in Blocks D, K and L. AT&T is working with the Nevada administrator to reconcile the subscriber data the administrator provided in connection with these numbers.



**Annual Lifeline Eligible Telecommunications Carrier Certification Form**

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**

**Deadline: January 31<sup>st</sup> (Annually)**

245194

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for *each* SAC through which it provides Lifeline service).

143004824

Service Provider Identification Number (SPIN)

2016

Recertification Year

South Carolina

State

BellSouth Telecommunications, LLC

ETC Name

AT&T South Carolina

DBA, Marketing or Other Branding Name

(If same as ETC name, list "N/A" Do not leave blank)

AT&T Inc.

Holding Company Name

(If same as ETC name, list "N/A" Do not leave blank)

**Does the reporting company have affiliated ETCs?**

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
See page 4	See page 4

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate bylaws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1: Initial Certification** All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial RLH

**Section 2: Annual Recertification**

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year  (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year  (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
6,286	4,091	123	272	1,800

**Recertification Results:**

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible  (This should be a subset of Block G.)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
1,936	1,239	697	1	698

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

**Note:** If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

**Certification:**

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial RLH

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: (List database or name of administrator here). Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial \_\_\_\_\_

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial \_\_\_\_\_



**Section 3: De-enroll Percentage**

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$M = (F+K)$	$N = (J+L)$	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
1,936	698	36.05

**Section 4: ETCs Subject to the Non-Usage Requirements**

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements? Yes ☐ No ☒

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

<b>P</b>	<b>Q</b>
Month	Subscribers De-Enrolled for Non-Usage
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	
Total Subscribers	

**Signature Block**

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Ronald L. Hilyer  
Signature of Officer

rh3168@att.com

Email Address of Officer

Debra M. Gamble

Person Completing This Certification Form

Ronald L. Hilyer, Controller

Printed Name and Title of Officer

January 30, 2017

Date

770-810-0852

Contact Phone Number

### Affiliated ETCs

SAC	Name
549004	AT&T CORP
639005	AT&T MOBILITY PUERTO RICO, INC.
259908	AT&T MOBILITY, LLC
399015	AT&T MOBILITY, LLC
529910	AT&T MOBILITY, LLC
539010	AT&T MOBILITY, LLC
215191	BELLSOUTH TELECOMMUNICATIONS, LLC
225192	BELLSOUTH TELECOMMUNICATIONS, LLC
235193	BELLSOUTH TELECOMMUNICATIONS, LLC
255181	BELLSOUTH TELECOMMUNICATIONS, LLC
265182	BELLSOUTH TELECOMMUNICATIONS, LLC
275183	BELLSOUTH TELECOMMUNICATIONS, LLC
285184	BELLSOUTH TELECOMMUNICATIONS, LLC
295185	BELLSOUTH TELECOMMUNICATIONS, LLC
345070	ILLINOIS BELL TELEPHONE COMPANY
325080	INDIANA BELL TELEPHONE COMPANY, INC.
315090	MICHIGAN BELL TELEPHONE COMPANY
555173	NEVADA BELL TELEPHONE COMPANY
209012	NEW CINGULAR WIRELESS PCS, LLC
269905	NEW CINGULAR WIRELESS PCS, LLC
279010	NEW CINGULAR WIRELESS PCS, LLC
289912	NEW CINGULAR WIRELESS PCS, LLC
319026	NEW CINGULAR WIRELESS PCS, LLC
389015	NEW CINGULAR WIRELESS PCS, LLC
409004	NEW CINGULAR WIRELESS PCS, LLC
449022	NEW CINGULAR WIRELESS PCS, LLC
479006	NEW CINGULAR WIRELESS PCS, LLC
619004	NEW CINGULAR WIRELESS PCS, LLC
545170	PACIFIC BELL TELEPHONE COMPANY
405211	SOUTHWESTERN BELL TELEPHONE COMPANY
415214	SOUTHWESTERN BELL TELEPHONE COMPANY
425213	SOUTHWESTERN BELL TELEPHONE COMPANY
435215	SOUTHWESTERN BELL TELEPHONE COMPANY
445216	SOUTHWESTERN BELL TELEPHONE COMPANY
305150	THE OHIO BELL TELEPHONE COMPANY
335220	WISCONSIN BELL, INC.